

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SYNTEGRAL CONSULTING CORPORATION, :  
d/b/a HIP HOP GRUBSPOT, a Florida corporation :  
and MIRIAM CHERY, :

Plaintiffs, :

-against- :

KEITH CLINKSCALES, LAMONTE JONES, :  
V. BROWN COMPANY, a New York :  
Corporation d/b/a KTC VENTURES, INC., :  
PEPSICO, INC., a North Carolina corporation, :  
and ESPN, INC., a Delaware corporation, :

Defendants. :  
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Civil Action No.: 10-CIV-1847 (CM)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE THAT**, upon the annexed affidavit of LaMonte Jones, sworn to July 6, 2010, and upon the accompanying Memorandum of Law, Defendants PepsiCo, Inc. and LaMonte Jones will move this Court before United States District Judge Colleen McMahon at 500 Pearl Street, New York, New York for an order pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing plaintiffs' complaint for failure to state a claim upon which relief may be granted, and for lack of personal jurisdiction over Mr. Jones.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
July 15, 2010

  
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